Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

Title V Draft Permit No. V-98-022
WORLDSOURCE COIL COATING, INC.
HAWESVILLE, KENTUCKY
May 3, 2000
JIM MORSE REVIEWER
Plant I.D. # 077-1580-0020
Application Log # F447

SOURCE DESCRIPTION:
Raw materials used are sodium hydroxide, chromic acid, metal coil stock, Bonderite metal coating, Methyl ethyl ketone, and various paints. The coil stock is unrolled through an alkaline spray wash, rinsed, acid washed, rinsed again, coated with Bonderite, dryed, painted, and recoiled. This is one continuous process for the length of the coil.

COMMENTS:.
The primary pollutants emitted from this source are Volatile Organic Compounds (VOC's). However, these VOC's are controlled by thermal incineration with a destruction efficiency of 90% to comply with 40 CFR 60 Subpart TT-Standards of performance for metal coil surface coating.

WorldSource is subject to an NSPS: 40CFR 60, Subpart TT-Standards of performance for metal coil surface coating, as well as Regulation 401 KAR 59:010, New process operations, Regulation 401 KAR 59:015, New indirect heat exchangers, and Regulation 401 KAR 63:060, Hazardous air pollutants and source categories. Review of the information submitted in their application indicates that they will readily meet all regulatory requirements. It can be assumed that all limits will be met as long as the incinerator is operated.

CREDIBLE EVIDENCE:
This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.